

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA

v.

HONG DAVIS (18)

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CR. NO. 6:22-CR-0003-JDK
Judge Kernodle

UNOPPOSED MOTION TO APPROVE TRAVEL WITHIN THE UNITED STATES

On March 7, 2022, the defendant voluntarily surrendered to the U.S. Marshal due to the arrest warrant issued in this matter. (Dct. # 93). She also appeared in court for her initial appearance and arraignment. (Dct. # 57 – 61). The defendant was released on a \$50,000.00 unsecured appearance bond. (Dct. # 61). The defendant surrendered her passport to the U.S. Probation officer. (Dct. # 150).

In the court's Conditions of Release, under condition (7)(f), the court noted that Ms. Davis' travel was restricted to the State of Texas unless prior approval by pretrial services was obtained. (Dct. # 62). Ms. Davis and her counsel have contacted her Pretrial Services officer. The officer stated he does not object to this requested travel but instructed Ms. Davis to ask for the court's permission to travel. Thus, this motion is being filed seeking permission to travel. The Assistant United States Attorney does not object to this travel request.

Ms. Davis requests permission to travel on July 19, 2022 from Dallas Love Field on Southwest Airlines flight # 734 (or if that flight is cancelled, on any replacement flight) to Denver, Colorado and return from Denver, Colorado to Dallas Love Field on July 21, 2022 on Southwest Airlines flight # 2810 (or if that flight is cancelled, on any replacement flight). Ms.

Davis will be traveling with a friend and they will go from Denver to Aurora, Colorado by vehicle and stay at a friend's house. The group will hike several hiking trails in Colorado.

Neither the probation officer nor the government are opposed to this travel.

The defendant proposes she be required to provide details of her travel to the Pretrial Services officer supervising her, including mode of travel, approximate route of travel, dates of travel (and any changes if flights are cancelled or delayed, etc.), location where she will be, contact information, and if necessary, requiring her to contact the Pretrial Services officer when she arrives in the Denver area and again when she arrives back in the Northern and Eastern District of Texas.

Respectfully submitted,

/s/ Michael J. Uhl

Michael Uhl

MICHAEL J. UHL, P.C.

TX State Bar No. 20371050

500 North Akard, Suite 2150

Dallas, Texas 75201

Telephone: (214) 237-0900

Facsimile: (214) 237-0901

CERTIFICATE OF CONFERENCE

I certify that on July 7, 2022 the Assistant United States Attorney stated that he did not oppose this request.

/s/ Michael J. Uhl

Michael J. Uhl

Attorney for Defendant

Michael J. Uhl, P.C.

500 North Akard, Suite 2150

Dallas, Texas 75201

(214) 237-0900

(214) 237-0901

mike@mikeuhllaw.com

CERTIFICATE OF SERVICE

I certify that on July 7, 2022 a copy of this Motion was delivered to the District Clerk, for delivery to the court, to the prosecutor, and to the U.S. Probation/Pretrial Services officer, via the ecf system and email.

/s/ Michael J. Uhl
Michael J. Uhl
Attorney for Defendant
Michael J. Uhl, P.C.
500 North Akard, Suite 2150
Dallas, Texas 75201
(214) 237-0900
(214) 237-0901
mike@mikeuhllaw.com